

**WHITE, CIRRITO, NALLY & LYNCH, LLP**

Attorneys at Law  
64 Hilton Avenue (**note new address**)  
Hempstead, New York 11550

William J. White (1929-2000)  
Mary Ellen Cirrito  
Michael L. Cirrito  
James P. Nally\*  
Christopher M. Lynch†  
Jennifer D'Ambrosio

-----  
(516) 292-1818  
**FAX** (516) 489-1940  
-----

**E-mail:** [Info@WhiteandCirrito.Com](mailto:Info@WhiteandCirrito.Com)

-----  
Glendy L. Chamaidan, L.A.  
Alaina P. Finamore, L.A.  
Cristal Acosta, L.A.

-----  
\*Admitted in NY & CT  
†Admitted in NY & NJ

**VIA EDNY EFILE**

February 3, 2022

Magistrate Judge Sanket J. Bulsara  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re:** Byron Geovanny Arevalo Fajardo et al. v. WB Maintenance & Design Group Inc. et al.  
Case No. 1:21-cv-05236-PKC-SJB  
Letter Motion requesting extension of time to submit Answer for Alexander Briceno  
from February 4, 2022 to March 4, 2022

Your Honor,

This office has just been retained to represent Defendant Alexander Briceno ("Defendant") in the above-referenced action. The deadline for Defendant to submit his answer to the Amended Complaint is currently February 4, 2022. I write to respectfully request an extension of time to submit an Answer to the Amended Complaint on behalf of Defendant to March 4, 2022.

The reason I am submitting this request is that my office was just retained yesterday and will need time to review the docket herein and prepare an answer to the 295-paragraph Amended Complaint. This request is made on consent of counsel for all parties to this action, and Defendant waives any objection to service of process.

Very truly yours,  
WHITE, CIRRITO, NALLY & LYNCH, LLP

/s/Christopher M. Lynch

CHRISTOPHER M. LYNCH, ESQ.  
(CL9047)

1:21-cv-05236-PKC-SJB  
Feb. 3, 2022  
2 of 2

cc via EFile: Levin-Epstein & Associates, P.C.  
Attorneys for Plaintiffs  
60 East 42nd Street  
Suite 4700  
New York, New York 10165  
(212) 792-0046

Koutsoudakis & Iakovou Law Group, PLLC  
Attorneys for Defendants WB Maintenance & Design Group Inc.,  
W.B. & Son Construction Corp., Wladimir Briceno, Betty Briceno,  
Jeissy Briceno, and Jeimy Briceno  
40 Wall Street, Ste 49th Floor  
New York, New York 10005  
(212) 404-8644